

1 BROWN RUDNICK LLP  
David J. Molton (SBN 262075)  
2 (DMolton@brownrudnick.com)  
Seven Times Square  
3 New York, New York 10036  
Telephone: (212) 209-4800  
4 Facsimile: (212) 209-4801

5 BROWN RUDNICK LLP  
Joel S. Miliband (SBN 077438)  
6 (JMiliband@brownrudnick.com)  
2211 Michelson Drive, Seventh Floor  
7 Irvine, California 92612  
Telephone: (949) 752-7100  
8 Facsimile: (949) 252-1514

9 *Attorneys for Fire Victim Trustee*

10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**  
13

14 In re:

15 **PG&E CORPORATION,**

16 **- and -**

17 **PACIFIC GAS AND ELECTRIC COMPANY,**  
18 **Debtors.**

- 19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

21 *\* All papers shall be filed in the Lead Case,*  
22 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S  
STATEMENT OF NON-  
OPPOSITION TO LETTER  
REQUEST OF JASON PARKER**

[Relates to Docket Number 14035]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the  
2 “**Trust**”), by and through her undersigned counsel, respectfully states as follows:

3 1. On January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and  
4 Electric Company (“**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the  
5 “**Debtors**”), commenced with the Court voluntary cases under chapter 11 of the Bankruptcy Code  
6 (the “**Chapter 11 Cases**”). The Reorganized Debtors filed the Chapter 11 Cases to address the  
7 billions of dollars of damage and loss relating to the devastating 2015, 2017 and 2018 California  
8 fires and to provide compensation to wildfire victims.

9 2. By Order dated July 1, 2019, the Court established October 21, 2019 (the “**Bar**  
10 **Date**”) as the last date to file proofs of claim in the Chapter 11 Cases [Docket No. 2806]. By Order  
11 dated November 11, 2019, the Court extended the Bar Date to December 31, 2019 (the “**Extended**  
12 **Bar Date**”) for unfiled, non-governmental Fire Claimants [Docket No. 4672].

13 3. By Order dated June 20, 2020 [Docket No. 8053] the Bankruptcy Court confirmed  
14 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June*  
15 *19, 2020* (as may be further modified, amended or supplemented from time to time, and together  
16 with any exhibits or scheduled thereto, the “**Plan**”). The Effective Date of the Plan occurred on  
17 July 1, 2020. *See* Dkt. No. 8252.

18 4. Pursuant to the Plan, the Trustee was appointed as the representative of each of the  
19 Debtors’ estates pursuant to sections 1123(a)(5), (a)(7), and (b)(3)(B) of the Bankruptcy Code was  
20 vested with the authority and power (subject to the Fire Victim Trust Agreement<sup>1</sup> and the Plan) to,  
21 among other things: (i) administer, object to or settle Fire Victim Claims; (ii) make distributions to  
22 holders of Fire Victim Claims in accordance with the terms of the Plan and the Fire Victim Trust  
23 Agreement, and (iii) carry out the provisions of the Plan related to the Trust and the Fire Victim  
24 Claims. *See* Plan § 6.8(b).

25 ///

26 \_\_\_\_\_  
27 <sup>1</sup> Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms  
28 in the Plan.

1           5.       Also pursuant to the Plan, all Fire Victim Claims were channeled to the Trust on the  
2 Effective Date and are subject to the Channeling Injunction, and any liabilities of the Debtors or the  
3 Reorganized Debtors, as applicable, for any Fire Victim Claims have been fully assumed by, and  
4 are the sole responsibility of, the Trust, and shall be satisfied solely from the assets of the Trust.  
5 *See* Plan §§ 4.7(a), 4.26(c), 6.7(a).

6           6.       To be eligible for compensation from the Trust a holder of a Fire Victim Claim must  
7 have timely filed a proof of claim. *See* Dkt. No. 8057-1.

8           7.       On March 4, 2020, Jason Parker filed proof of claim number 97098 (the “**Proof of**  
9 **Claim**”). No other proof of claim for Mr. Parker has been channeled to the Trust.

10          8.       On January 28, 2021, Mr. Parker timely submitted a Claims Questionnaire to the  
11 Trust.

12          9.       On August 1, 2022 the Trust sent an email (the “**Late Claim Email**”) to all  
13 claimants, including Mr. Parker, who had submitted Claims Questionnaires to the Trust based on  
14 proofs of claims filed after the Extended Bar Date. The Late Claim Email informed these claimants  
15 that their proofs of claim would need to be deemed timely filed by the Bankruptcy Court in order  
16 for their Fire Victim Claims to be eligible for compensation by the Trust.

17          10.      On September 28, 2023, Mr. Parker filed a letter with the Court seeking to have the  
18 Proof of Claim deemed timely [Docket No. 14035] (the “**Late Claim Letter**”).

19          11.      Given Mr. Parker’s engagement with the Trust and the status of his claims within  
20 the Trust’s claims administration process, the Trustee does not object to this Court deeming the  
21 Proof of Claim timely for the purpose of administration by the Trust.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1           12.     Nothing herein is intended to, nor shall it be construed to be, a waiver by the Fire  
2 Victim Trust, or any other party in interest of any right to object to the Proof of Claim on any  
3 grounds other than the untimely filing thereof.

4  
5 DATED: October 11, 2023

BROWN RUDNICK LLP

6  
7 By: /s/ David J. Molton

8 David J. Molton (SBN 262075)  
9 (DMolton@brownrudnick.com)  
10 Seven Times Square  
11 New York, New York 10036  
12 Telephone: (212) 209-4800  
13 Facsimile: (212) 209-4801

14 and

15 Joel S. Miliband (SBN 077438)  
16 (JMiliband@brownrudnick.com)  
17 2211 Michelson Drive  
18 Seventh Floor  
19 Irvine, California 92612  
20 Telephone: (949) 752-7100  
21 Facsimile: (949) 252-1514

22 *Attorneys for Fire Victim Trustee*  
23  
24  
25  
26  
27  
28